

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

Date Filed: February 29, 2008

Name of Companies Covered by this Certification: Eureka Telecom, Inc.  
A.R.C. Networks, Inc.  
Eureka Telecom of VA, Inc.  
InfoHighway of Virginia, Inc.

Form 499 Filer ID: 820387

Name of Signatory: Charles C. Hunter

Title of Signatory: Executive Vice President &  
General Counsel

Title of Signatory: Executive Vice President,  
General Counsel & Secretary

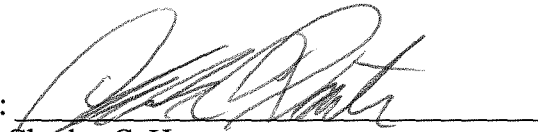
I, Charles C. Hunter, certify that I am an officer of each of the companies named above and, acting as an agent of each of the companies, that I have personal knowledge that each of the companies has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how each of the companies' procedures ensure that each of the companies is in compliance with the requirements set forth in § 64.2001 *et seq.* of the Commission's rules.

None of the companies has taken any actions (instituted a proceeding or filed a petition at either a state commission, a court or the Commission) against data brokers in the past year. None of the companies has any information to report with respect to the processes pretexters are using to attempt to access CPNI. The steps the companies have taken to protect CPNI are set forth in the statement accompanying this certification.

None of the companies has received any customer complaints in the past year concerning the unauthorized use of CPNI.

Signed:

A handwritten signature in black ink, appearing to read 'Charles C. Hunter', written over a horizontal line.

Charles C. Hunter

Executive Vice President, General Counsel & Secretary

Eureka Telecom, Inc.

A.R.C. Networks, Inc.

Eureka Telecom of VA, Inc.

InfoHighway of Virginia, Inc.

## **Compliance Procedures**

Set forth below is the statement of Eureka Telecom, Inc., A.R.C. Networks, Inc., Eureka Telecom of VA, Inc. and InfoHighway of Virginia, Inc. (collectively, "InfoHighway") in support of their calendar year 2007 certification that each has established operating procedures that are adequate to ensure compliance with the rules set forth in Subpart U of Part 64 of the Commission's Rules and Regulations.

### **Use, Disclosure and Access to CPNI**

- InfoHighway does not disclose or provide access to the customer proprietary network information ("CPNI") of its customers to any third parties other than in response to lawful subpoenas or governmental mandates.
- Vendors who have access to the CPNI of InfoHighway's customers – *e.g.*, underlying carriers – are subject to strict confidentiality requirements.
- InfoHighway does not use its customers' CPNI in sales or marketing campaigns.
- InfoHighway secures from its customers at the time they contract for service with InfoHighway written authority to use the customers' CPNI in a manner consistent with Subpart U of Part 64 of the Commission's Rules and Regulation. The authorization that is obtained is set forth below:

**Authorization to Use CPNI:** Customer hereby authorizes Company to use and to disclose and permit access by its affiliates and partners to Customer's customer proprietary network information ("CPNI") in order to enhance Company's ability to offer products and services tailored to Customer's needs. CPNI is information that relates to the quantity, technical configuration, type, destination, and amount of use of the Services by Customer and that is made available to Company solely as a result of Company's provision of the Services to Customer. Under federal law, Company has a duty to protect Customer's CPNI and Customer has the right to prohibit certain uses of its CPNI. Although Customer's authorization to Company to use, disclose and permit access to Customer's CPNI will remain in effect until Customer affirmatively revokes such authorization, Customer may withdraw its authorization at any time simply by notifying Company in writing. Denial by Customer of authorization to use, disclose and permit access to Customer's CPNI will not affect Company's provision of the Services to Customer.

InfoHighway maintains these authorizations for the duration of the customer's service term with InfoHighway, but in no event less than a year.

- Other than as noted below, InfoHighway does not allow its sales representatives to access any systems that contain its customers' CPNI. The only employees of InfoHighway that are authorized to engage in sales activities and have access to systems that contain the CPNI of InfoHighway's customer are InfoHighway's Total Solutions Management personnel ("TSMs"). TSMs are highly-trained account managers dedicated to InfoHighway's larger enterprise customers. The principal function of TSMs is to provide personalized, "hands-on" service to these large accounts. In performing this function, TSMs will suggest additional services that they believe will enhance their dedicated accounts' service experience. To facilitate this function, TSMs are provided access to their dedicated accounts' CPNI. While InfoHighway's large accounts generally take a full panoply of services from InfoHighway, including local and long distance, voice and data services, a limited number of such customers may not subscribe to all service categories. With respect to these customers, CPNI may be used to offer services outside of the category of services to which they subscribe.
- InfoHighway does not use, disclose or permit access to its customers' CPNI to identify or track customers that call competing service providers.

#### **Safeguards Against Disclosure of CPNI to Unauthorized Parties**

- InfoHighway allows online access by customers to their CPNI only by password.
- InfoHighway has also established a password system to prevent the unauthorized disclosure of call detail information over the telephone based on a customer-initiated call.
- InfoHighway does not maintain any retail locations.

#### **Training**

- InfoHighway has developed and implemented training modules to ensure employee compliance with CPNI safeguards.
- InfoHighway has appointed a CPNI compliance officer to ensure compliance with and enforcement of CPNI policies and procedures.

#### **CPNI Breaches**

- InfoHighway has established procedures for the timely identification, recording and reporting of breaches of its customers' CPNI.